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Attorneys for Plaintiff, Matthew Alexander,
for himself and other members of the general
public similarly situated

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Matthew Alexander,)
Plaintiff,) Docket No. 2:13-cv-02005-LDG-CWH
vs.)
GNLV, Corp.)
GNL, Corp.,)
Defendants.)

)

Plaintiff Matthew Alexander, for himself and other members of the general public similarly situated, by and through undersigned counsel hereby moves the Court for an entry of an Order to file under seal Plaintiff Matthew Alexander's Suggestions in Opposition to Defendants' Motion to Dismiss First Amended Complaint. As support for this Motion, Plaintiff states as follows:

1 1. Plaintiff and third party Epicor Retail have agreed to abide by the terms of a
2 protective order entered by the Court. [Doc. 47]

3 2. Pursuant to the terms of the protective order, deposition transcripts are
4 automatically treated as containing confidential information for the first thirty days after the
5 transcript is released.

6 3. Plaintiff is filing his Suggestions in Opposition to Defendants' Motion to Dismiss
7 First Amended Complaint which contains information obtained at the deposition of Epicor
8 Retail, which occurred less than thirty days ago and therefore the information is required to be
9 treated as confidential. In order to comply with the terms of the protective order, Plaintiff
10 requests that the Court allow Plaintiff's Opposition to be filed under seal.

11 4. Plaintiff believes that the burden is on Epicor to establish that the information
12 designated as confidential pursuant to the agreement is entitled to heightened protection.
13 Nonetheless, Plaintiff requests that the Court file under seal Plaintiff Matthew Alexander's
14 Suggestions in Opposition to Defendants' Motion to Dismiss First Amended Complaint so that
15 Plaintiff can comply with the protective order.

16 5. Accordingly, Plaintiff respectfully requests that the Court enter an Order filing
17 Plaintiff Matthew Alexander's Suggestions in Opposition to Defendants' Motion to Dismiss First
18 Amended Complaint under seal.

22 Dated: October 2, 2014

STUEVE SIEGEL HANSON LLP

23 _____
24 /s/ Christopher D. Dandurand
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24 **ATTORNEYS FOR PLAINTIFFS**

25 **CERTIFICATE OF SERVICE**

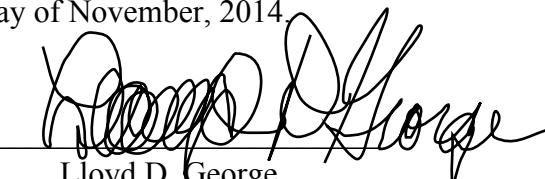
26 Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on October 2, 2014, a copy of the
27 foregoing document was served via ECF to the counsel of record in this case.

28 **ORDER**

29 IT IS SO ORDERED.

30 /s/ Christopher D. Dandurand
31 Attorney for Plaintiff

32 DATED this 25 day of November, 2014

33 
34 Lloyd D. George
35 Sr. U.S. District Judge³